

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

UNITED STATES OF AMERICA )  
                                )  
                                ) NO. 3:22-cr-00327  
v.                             )  
                                )  
                                )  
[1] CHESTER GALLAGHER     )  
[2] HEATHER IDONI         )  
[3] CALVIN ZASTROW        )  
[4] COLEMAN BOYD         )  
[5] CAROLINE DAVIS        )  
[6] PAUL VAUGHN            )  
[7] DENNIS GREEN            )  
[8] EVA EDL                )  
[9] EVA ZASTROW            )  
[10] JAMES ZASTROW        )  
[11] PAUL PLACE            )

**MOTION TO EXTEND TIME TO RESPOND TO MOTION TO DISMISS**

The United States of America, by and through the undersigned attorney, respectfully moves this Court to extend the period of time for the United States to respond to the defendants' Motion to Dismiss (the "Motion," DE #245).

The United States respectfully request one additional week to reply to the Motion. In support thereof, the undersigned concluded a five-week long trial before Judge Campbell in *United States v. Gilbert Ghearing*, Case No. 2:19-cr-00010, on March 28, 2023. Therefore, the United States requests an extension of the deadline within which to respond to the Motion from April 3, 2023, to April 10, 2023. Counsel for Chester Gallagher, Heather Idoni, Calvin Zastrow, Coleman Boyd, Caroline Davis, Paul Vaughn, Dennis Green, Eva Zastrow, James Zastrow, and Paul Place do not oppose this motion. The United States has not received a

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response from the remaining defendant's counsel, but understands that he may be unavailable.  
(See DE 246).

Respectfully submitted,

HENRY C. LEVENTIS  
United States Attorney

By: /s/ Amanda Klopf  
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**CERTIFICATE OF**  
**SERVICE**

I hereby certify that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the attorneys of record for the defendant.

*/s/ Amanda J. Klopf*  
AMANDA J. KLOPF  
Assistant United States Attorney  
March 29, 2023